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18 Attorneys Specially Appearing for Defendant
19 WYETH HOLDINGS LLC f/k/a
20 AMERICAN CYANAMID COMPANY

21 **UNITED STATES DISTRICT COURT**

22 **DISTRICT OF NEVADA**

23
24 JORDAN J. POTTER

25 Plaintiff,

26 v.

27 CRANE CO., et al.

28 Defendants.

Case No. 2:20-cv-00276-RFB-VCF

**REQUEST FOR STIPULATED STAY AS
TO WYETH HOLDINGS LLC,
INCLUDING ITS PENDING MOTION TO
DISMISS FOR LACK OF PERSONAL
JURISDICTION MADE PURSUANT TO
FRCP 12(b)(2)**

1 Specially Appearing Defendant Wyeth Holdings LLC f/k/a American Cyanamid
 2 Company (“Wyeth”), hereby informs the Court that on December 8, 2021 it entered into a
 3 settlement agreement with Plaintiff, which resolves all of Plaintiff’s claims against Wyeth.

4 Wyeth respectfully requests that the Court stay the case as to Wyeth, including its
 5 pending Motion to Dismiss for Lack of Personal Jurisdiction made pursuant to FRCP 12(b)(2)
 6 (“Motion to Dismiss”) to permit Wyeth and Plaintiff time to finalize the settlement. “A district
 7 court has discretionary power to stay proceedings in its own court.” *Lockyear v. Mirant Corp.*,
 8 398 F.3d 1098, 1109 (9th Cir. 2005). A stay will promote judicial economy by relieving the
 9 court of its obligation to further consider and rule on Wyeth’s pending Motion to Dismiss. The
 10 stay also will prevent the unnecessary time and expense Wyeth otherwise would incur continuing
 11 to conduct expert discovery and prepare this case for trial when a settlement has been reached.
 12 Wyeth and counsel for plaintiff have reached such settlements in the past and they do not expect
 13 any issues to arise.

14 Respectfully submitted,

15 **KING & SPALDING**

16 Dated: December 10, 2021

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IT IS SO ORDERED.

Dated:



RICHARD F. BOULWARE, II
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing document to be electronically served on counsel of record on the current service list this 10th day of December, 2021 via e-mail.

s/ Troy D. McMahan
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21 **HENKEL US OPERATIONS CORPORATION, incorrectly named as Henkel**
22 **Corporation as successor-in-interest to Locite Corporation**

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